

### **REMARKS**

In response to the first Office Action mailed April 23, 2004 (Paper No. 3), the Assignee of the present application submits the following amendments and remarks. The Office Action rejected claims 1-16, 18-26, 28-31, and 33-53 as obvious in view of U.S. Patent No. 6,073,140 to *Morgan* (hereinafter "*Morgan*"). Other non-substantive grounds of rejection were advanced for claims 1-8, 28-32, and 45-47. Corresponding amendments and remarks for each of these grounds for rejection are addressed below.

The present response traverses the Office Action obviousness rejection since particular elements of the claimed invention are neither taught or suggested by the cited art. In particular, the claimed invention is distinguished from the cited art for at least the following reasons:

- The claimed invention associates each record entry in a universe database with a unique universe identifier or "UUID," and further associates each record entry in a customer file with a unique customer number or "UCID," wherein the UCID and UUID are two different unique identifiers; whereas the *Morgan* patent utilizes a common "persistent key" to identify a data structure stored both in a data vendor's central database and on a data customer's database;
- The claimed invention compares a portion of content of the customer file with a portion of content of the universe file to determine whether a change has occurred between the files; whereas the *Morgan* patent utilizes a version number in each "persistent key" to correlate records stored both in a data vendor's central database and on a data customer's database, and compares the version number in the corresponding persistent keys to determine whether a change has occurred between records.

- The claimed invention permits a user to disseminate a different UCID to different customers, while maintaining the UUID as a “private key”; whereas, the common “persistent key” of the *Morgan* patent is always disseminated to customers and is not a “private key.”

These and other arguments are presented in the amendments and remarks below.

**I. THE REJECTION OF CLAIMS 1-16, 18-26, 28-31, AND 33-53 UNDER 35 U.S.C. 103(a)**

The Office Action rejected claims 1-16, 18-26, 28-31, and 33-53 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,073,140 to *Morgan* (hereinafter “*Morgan*”). Office Action, pp. 5-8, ¶¶ 13-14. Independent claim 1 recites the specific elements, “storing a plurality of processed record entries in a universe database, each record entry being associated with a unique universe identifier (“UUID”)” and “assigning a unique customer number (“UCID”) for each record entry contained in the customer file ....” These claim elements are neither disclosed nor taught by the *Morgan* patent. The claimed invention of claim 1 recites a UUID and a UCID that are separate and distinct identifiers for two different types of records. This concept is explained in the Applicants’ Specification, wherein, “An information supplier’s universe database includes record entries, which are subject to change. Each record entry is associated with a unique universe identifier (“UUID”) ... A UUID is stable over time, thus can be used to link raw data generated by an economic entity and which raw data are subject to change.” Page 3, lines 6-12. Furthermore, the Specification states that “When an information buyer transfers its customer database to the information supplier to update its database, the supplier assigns a set of unique customer identifiers (“UCID’s”) to each record entry in the

customer's database. A UCID is assigned to each and every record entry in the customer's database regardless of whether a record entry corresponds to an existing economic entity. The UCID is stable over a period of time, and each of the customer record entries is organized per person. Accordingly each of the UCIDs can be used to link separate data generated over time regarding a particular customer of an information buyer." Page 3, lines 13-20. Therefore, the claimed invention of claim 1 associates each record entry in a universe database with a unique universe identifier or "UUID," and further associates each record entry in a customer file with a unique customer number or "UCID," wherein the UCID and UUID are two different unique identifiers for two different types of records.

The separate UUID and UCID identifiers of the Applicant's claimed invention in claim 1 are different than the common "persistent key" utilized in the *Morgan* patent to identify a data structure stored both in a data vendor's central database and on a data customer's database. The *Morgan* patent explains that, "When a data structure representing an entity is stored both in the data vendor's central database and on a data customer's database, the persistent keys linked to each of these data structures will match." Col. 3, lines 57-61. Thus, at least one distinction between the Applicants' claimed invention and the *Morgan* patent is that the UUID and UCID identifiers for two corresponding records are not the same unique identifiers and will not match each other, even though the UUID and UCID identifiers can be utilized to match corresponding records together.

Furthermore, independent claim 1 recites the specific element, "comparing the content of ~~the~~ a customer file with the content of the universe database ...." (Strikethrough and underlining supplied). This claim element, in combination with the other recited elements of the claim, is neither disclosed nor taught by the *Morgan* patent.

The claimed invention of claim 1 recites comparing a portion of content of the customer file with a portion of content of the universe file to determine whether a change has occurred between the files. This is further explained by the Applicants' Specification, wherein, "The supplier then matches or correlates the content of the WCF 208 [working customer file] with the information contained in the UF 210 [universe file]." Page 7, lines 31-32. Therefore, the claimed invention of claim 1 compares the contents of the two types of files; whereas, the *Morgan* patent merely compares the common "persistent keys" to determine whether a change between corresponding data structures has occurred. The *Morgan* patent states that, "The version number in each persistent key is incremented each time any field in the record linked to that persistent key is changed .... By comparing version numbers between otherwise-similar persistent keys, a data vendor can determine which data structures in a data customer's database have changed since the data customer's last data update." Col. 4, lines 23-33. Thus, another distinction between the Applicants' claimed invention and the *Morgan* patent is that the claimed invention of claim 1 "compares" records, whereas the *Morgan* patent does not "compare" records but merely compares the version numbers of common and similar persistent keys to determine whether a change to the record has occurred.

Some or all of the above features of the claimed invention of claim 1 permit a user to disseminate a different UCID to different customers, while maintaining the UUID as a "private key." This concept is neither disclosed nor suggested by the *Morgan* patent. In contrast, the common "persistent key" of the *Morgan* patent is always disseminated to customers and is not a "private key." The Applicants' Specification highlights some of the advantages derived from the Applicants' claimed invention, including preventing "inadvertent contamination of information between the customer database and the universe

database,” providing a way “to prudently control highly sensitive information,” providing “a way to protect against information theft,” and reducing “the chance that one buyer will accidentally obtain access to another buyer’s information.” Page 4, lines 13-19. Some or all of these advantages cannot be obtained by using a common “persistent key” approach disclosed by the *Morgan* patent when the persistent key is always disseminated to customers and is not a “private key.”

Since none of the above claim elements of claim 1 are either disclosed or suggested by the cited art, the Assignee submits that the claimed invention of claim 1 should be allowable over the cited art. Furthermore, independent claims 9, 18, 28, 33, 36, 39, 42, 45, and 48 each recite elements including UUID and UCID identifiers, for which arguments of patentability and distinction over the cited art have been advanced above with respect to claim 1. Therefore, independent claims 9, 18, 28, 33, 36, 39, 42, 45, and 48 should also be allowable over the cited art.

Moreover, dependent claims 2-8, 10-17, 19-27, 29-32, 34-35, 37-38, 40-41, 43-44, 46-47, and 49-53 are ultimately dependent from at least amended independent claim 1, or from one of the original independent claims 9, 18, 28, 33, 36, 39, 42, 45, and 48 for which arguments of patentability have already been advanced above. Therefore, if the underlying independent claim is determined to be patentable, then the corresponding dependent claims should also be patentable over the cited art.

## **II. OBJECTION TO CLAIMS 17, 27, AND 32**

Claims 17, 27, and 32 have been objected to as containing allowable subject-matter, but otherwise being dependent upon a rejected independent base claim. Arguments for patentability of the underlying independent claims are advanced in the present

response, therefore Assignee believes that dependent claims 17, 27, and 32 are in condition for allowance.

### **III. REJECTION OF CLAIMS 1-8 UNDER 35 U.S.C. 112, 2<sup>ND</sup> PARAGRAPH**

Claims 1-8 have also been rejected under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph.

Independent claim 1 has been amended with the elements as follows, “accessing content of a customer file” and “comparing the content of ~~the~~ a customer file with the content of the universe database ....” (underlining and strikethrough supplied). The amendment is supported by the specification, and further corrects the antecedent basis for “customer file” in claim 1 as well as the remaining dependent claims 2-8. The Office Action recommended the limitation “receiving said customer file or receiving the customer file,” however, the customer file should be not limited to being “received” as the customer file can be accessed or otherwise provided using storage devices or via any communicational means. See Specification, p. 7, lines 18-24. The present rejection under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph is respectfully traversed.

### **IV. REJECTION OF CLAIMS 2 AND 8 UNDER 35 U.S.C. 112, 2<sup>ND</sup> PARAGRAPH**

Claims 2 and 8 have also been rejected under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph. The Applicants have amended claim 2 to clarify the claim. Dependent claim 2 has been amended as follows, “The method of Claim 1, wherein each UUID is stable ~~over a period of time~~; and each UCID is stable ~~over another period of time~~, and the raw data is subject to change.” (strikethrough supplied). As defined by the Applicants’ specification, the UUID and UCID can be stable over the same or different periods of time, and the respective periods of stability can be any amount of time. See Page 5, line 9; and Page 6, lines 24-25.

The present rejection under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph is respectfully traversed, and claim 2 is now in condition for allowance.

The Applicants have amended claim 8 to clarify the claim. Dependent claim 8 has been amended as follows, "The method of Claim 1, wherein the action of updating at least a portion of at least one record entry is accomplished ~~in near real-time~~ via the Internet." (striketrough supplied). As defined by the Applicants' specification, "The supplier can provide new time-critical information to the buyer 410a via any real-time methods of communications, including the Internet and wireless communications. See Page 10, lines 10-12. The present rejection under 35 U.S.C. 112, 2<sup>nd</sup> Paragraph is respectfully traversed, and claim 8 is now in condition for allowance.

**V. REJECTION OF CLAIMS 28-32 AND 45-47 UNDER 35 U.S.C. 112, 2<sup>ND</sup> PARAGRAPH**

Claims 28-32, and 45-47 have also been rejected 35 U.S.C. 101. Independent claims 28 and 45 have each been amended to recite "A computerized processing system ...." (underlining supplied). Amended claims 28 and 45 now distinguish abstract ideas such as manually performed processes. The present rejection under 35 U.S.C. 101 is respectfully traversed, and claims 28-32, and 45-47 are now in condition for allowance.

**CONCLUSION**

Claims 1-53 are pending in the application. Independent claims 1, 28, and 45, and dependent claims 2 and 8 have been amended. All of the claim rejections have been respectfully traversed by the present response. Claims 1-53 are now in condition for allowance. The Examiner is invited and encouraged to contact the undersigned attorney of record at (404) 815-6048 if such contact will facilitate a Notice of Allowance for claims 1-53. If any additional fees are due, the Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, to Deposit Account No. 11-0855.

Respectfully submitted,



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